

Submitted by Defendants in Teddy Bearys Ltd. V. Dover Publications, Inc. et al

**DISCOVERY PLAN WORKSHEET**

(Please be advised that the Court's Individual Rules include additional forms to be used in cases involving claims of adverse employment or FLSA violations.)

**Tier I Pre-Settlement Discovery**

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:

Oct. 5

Completion date for Phase I Discovery as agreed upon by the parties:

Oct. 12

*(Reciprocal and agreed upon document production, generally not including depositions, unless otherwise agreed. No more than 30 days after Initial Conference)*

Nov. 1

Status conference TBD by the court:

*(Generally 15 days post Tier I Discovery)*

**Tier II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings:  
*(Presumptively 15 days post status conference)*

Nov. 2

First requests for production of documents and for interrogatories due by:  
*(Presumptively 15 days post joining/amending )*

Nov. 28

All fact discovery completed by:  
*(Presumptively 3.5 months post first requests for documents/interrogatories )*

March 29, 2019

Exchange of expert reports completed by:  
*(Presumptively 30 days post fact discovery)*

April 26

Expert depositions completed by:  
*(Presumptively 30 days post expert reports)*

May 24

Final date to take first step in dispositive motion practice:  
*(Parties are directed to consult the District Judge's individual rules regarding such motion practice. Presumptively 30 days post expert depositions)*

June 28

**COMPLETION OF ALL DISCOVERY BY:**  
*(Note: Presumptively 9 months after Initial Conference.)*

June 21

Submission of joint pre-trial order:

Aug. 16

Final Pre-Trial Conference TBD by the court: